



Case 1:13-cr-00165-LTS Document 7 Filed 12/16/15 Page 1 of 2  
U.S. Department of Justice

United States Attorney  
Southern District of New York

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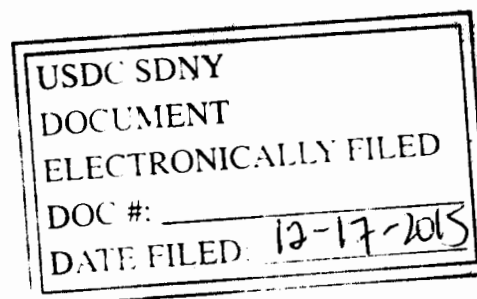
The Silvestro J. Molloy Building  
One Saint Andrew's Plaza  
New York, New York 10007

December 16, 2015

**VIA ECF AND FACSIMILE TRANSMISSION**

**FAX # 212-805-0426**

The Honorable Laura Taylor Swain  
United States District Judge  
United States District Court for the  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Chambers 1320  
New York, New York 10007



Re: *United States v. Manuel Antonio Lluberres Rodriguez*  
13 Cr. 165 (LTS)

Dear Judge Swain:

The Government writes to request, with the consent of Joshua Dratel, Esq., counsel for the defendant, that the time from today through January 4, 2016, the date of the first pretrial conference in this matter be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). By way of background, on December 10, 2015, Lluberres Rodriguez was taken into custody by the DEA in Panama pursuant to an extradition request by the United States. Lluberres Rodriguez had previously been arrested in Panama on or about April 24, 2014 pursuant to a provisional arrest warrant issued on the basis of the above-referenced indictment. On December 11, 2015, Lluberres Rodriguez was presented and arraigned before Magistrate Judge Ronald L. Ellis. Lluberres Rodriguez was detained on consent of defense counsel. Upon consultation with your Honor's law clerk, an initial pretrial conference was set for January 4, 2016 at 3:00 p.m.

The Government is preparing and intends to produce discovery early next week. I have spoken with Joshua Dratel, Esq., counsel for the defendant, who consents to the exclusion of time under the Speedy Trial Act from today through January 4, 2016. The Government therefore

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Respectfully requests that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from today through January 4, 2016, to allow defense counsel time to consult with his client and begin reviewing discovery.

Very truly yours,

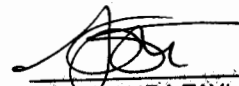
PREET BHARARA  
United States Attorney

by: /s/  
Elisha J. Kobre  
Assistant United States Attorney  
(212) 637-2599

cc: Joshua Dratel, Esq.

*The exclusion request is granted.*

**SO ORDERED:**

 12/16/15  
HON. LAURA TAYLOR SWAIN  
UNITED STATES DISTRICT JUDGE